IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

| ML FASHION, LLC, and ML RETAIL, |) | |
|---------------------------------|---|------------------------|
| |) | |
| Plaintiffs, |) | Case No. 1:20-cv-05124 |
| |) | |
| v. |) | |
| |) | Hon. Steven C. Seeger |
| NOBELLE GL, LLC, STEPHANIE |) | |
| MENKIN, SARIT MAMAN NARANI, and |) | |
| NICOLAS GOUREAU, |) | |
| |) | |
| Defendants |) | |

DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY IN FURTHER SUPPORT OF THEIR MOTION FOR AN ORDER AWARDING SANCTIONS UNDER 28 U.S.C. § 1927 OR THE COURT'S INHERENT AUTHORITY

Defendants respectfully submit this Notice to apprise this Court of today's developments in another of Plaintiffs' duplicative actions filed in Illinois, which was initiated back in November 2020 in the Circuit Court of Cook County and was styled as *ML Fashion, LLC, et al. v. Goureau, et al.*, No. 2020L012546 (Ex. 4 to Dkt. No. 48). Today, the Circuit Court granted Defendants Menkin and Goureau's motion to dismiss for lack of personal jurisdiction, calling Plaintiffs out on their inability to defend their jurisdictional theory in the face of *Walden v. Fiore*, 571 U.S. 277, 285 (2014). The Circuit Court's signed order is forthcoming and will be filed as soon as it becomes available. As Defendants argued here, these are the same Plaintiffs, represented by the same counsel, asserting the same allegations against the same Defendants that were before the Court here, asserting the same claims based on the same purported misappropriation of company funds that are now dismissed in Cook County.

Dated: April 30, 2021 /s/ Elizabeth L. Janczak

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